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August 13, 2021

By ECF

The Honorable John G. Koeltl
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, New York 10007-1312

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Application granted. SO ORDERED.

New York, NY      /s/ John G. Koeltl
August 16, 2021   John G. Koeltl, U.S.D.J.
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Re: *Roche Cyrulnik Freedman LLP v. Cyrulnik*, Case No. 1:21-cv-01746 (JGK)

Dear Judge Koeltl:

Pursuant to Rule 6.A.2 of Your Honor's Individual Practices, I write on behalf of Defendant Jason Cyrulnik to request permission to file under temporary seal certain documents in support of Defendant's motion to dismiss the amended complaint, which is being filed concurrently herewith.[1] Defendant intends to reference certain documents and information Plaintiff contends are confidential and warrant sealing. Although Defendant does not believe the materials warrant sealing, we make this request in the interest of again affording Plaintiff the opportunity to file a motion for longer-term sealing, to which motion Defendant will respond in due course. In accordance with Rule 6.A.2 of your Honor's Individual Practices, we have notified Plaintiff of its obligation to file a letter within three days explaining the need to seal the materials.

We thank the Court for its consideration of this request.

Respectfully,

Gavin D. Schryver

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[1] This request for temporary sealing is substantially similar to Defendant's prior request made by letter motion, dated June 11, 2021 and granted on June 15, 2021, in connection with Defendant's motion to dismiss the original complaint. (ECF Nos. 22, 27.)

KASOWITZ BENSON TORRES LLP

Hon. John G. Koeltl
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cc: Counsel of Record (via ECF)